

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:17-mc-00151-LPS
	)	
BOLIVARIAN REPUBLIC OF VENEZUELA,	)	
	)	
Defendant.	)	
	)	
	)	
_____	)	

**THE BOLIVARIAN REPUBLIC OF VENEZUELA,  
PETROLEOS DE VENEZUELA, S.A., PDV HOLDING, INC. AND  
CITGO PETROLEUM CORPORATION'S  
MOTION TO STAY PENDING APPEAL**

The Bolivarian Republic of Venezuela, Petróleos de Venezuela, S.A., PDV Holding, Inc., and CITGO Petroleum Corporation respectfully move to stay further proceedings in this action pending their appeal to the Third Circuit of this Court's January 14, 2021 Order (D.I. 235). The grounds for this motion are fully set forth in the opening brief filed contemporaneously with this motion.

February 12, 2021

Respectfully submitted,

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

Nathan P. Eimer  
Lisa S. Meyer  
EIMER STAHL LLP  
224 South Michigan Avenue  
Suite 1100  
Chicago, IL 60604  
(312) 660-7600  
NEimer@eimerstahl.com  
LMeyer@eimerstahl.com

/s/ Kenneth J. Nachbar  
Kenneth J. Nachbar (#2067)  
Alexandra M. Cumings (#6146)  
1201 North Market Street  
Wilmington, DE 19801  
(302) 658-9200  
KNachbar@mnat.com  
ACumings@mnat.com

*Attorneys for PDV Holding, Inc., and  
CITGO Petroleum Corporation*

OF COUNSEL:

Joseph D. Pizzurro  
Julia B. Mosse  
Kevin A. Meehan  
Juan O. Perla  
CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP  
101 Park Avenue  
New York, NY 10178  
(212) 696-6000  
jpizzurro@curtis.com  
jmosse@curtis.com  
kmeehan@curtis.com  
jperla@curtis.com

OF COUNSEL:

Donald B. Verrilli, Jr.  
Elaine J. Goldenberg  
Ginger D. Anders  
Brendan B. Gants  
Jacobus P. van der Ven  
Munger, Tolles & Olson LLP  
601 Massachusetts Avenue NW  
Suite 500 E  
Washington, D.C. 20001  
(202) 220-1100  
Donald.Verrilli@mto.com

George M. Garvey  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071  
(213) 683-9100  
George.Garvey@mto.com

HEYMAN ENERIO GATTUSO & HIRZEL LLP

/s/ Samuel Taylor Hirzel, II  
Samuel Taylor Hirzel, II (#4415)  
300 Delaware Avenue, Suite 200  
Wilmington, DE 19801  
(302) 472-7300  
shirzel@hegh.law

*Attorney for Petróleos de Venezuela, S.A.*

ABRAMS & BAYLISS LLP

/s/ A. Thompson Bayliss  
A. Thompson Bayliss (#4379)  
Stephen C. Childs (#6711)  
20 Montchanin Road, Suite 200  
Wilmington, DE 19807  
(302) 778-1000  
bayliss@abramsbayliss.com  
childs@abramsbayliss.com

*Attorneys for Bolivarian Republic of Venezuela*